

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6343-CR-ZLOCH

UNITED STATES OF AMERICA,

Plaintiff,

v.

LINDON JOHNSON,
a/k/a "Pablo"
a/k/a "Tommy"
MOSI GRANT
a/k/a "Pepe"
a/k/a "Spanky"
RICKY MOTEN
VINCENT HAUGHTON,
a/k/a "Junior," and
TAMEKA JOHNSON

Defendants.

FILED
MAR -8 10:33
[Signature]

GOVERNMENT'S NOTICE OF EXPERT TESTIMONY

The United States of America, by and through the undersigned Assistant United States Attorney hereby provides notice pursuant to Fed. R. Crim. P. 16(a)(1)(E) of the Government's intent to use expert testimony in its case-in-chief at trial, and states as follows:

Name of Witness: Maria E. Hernandez

Training/Qualifications: See attached Summary of Training and Qualifications.

Summary of Testimony/Opinion and basis:

The government intends to call Maria E. Hernandez, a qualified forensic chemist who will give an expert opinion that the two packages seized from Cadia Gritton by DEA agents on January 16, 2000, and introduced into evidence by the government contain marijuana with net weights of 6.4 grams (package 1), and a net weight of 3216 grams (package 2). She will also

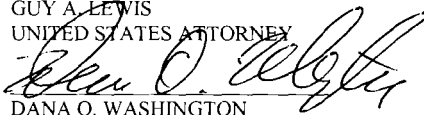
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testify that the three packages seized from Yvette Jenkins by law enforcement officers on March 2, 2000, and introduced into evidence by the government contain cocaine base ("crack cocaine") and phenacetin with net weights of 133.4 grams (package 1); cocaine hydrochloride and phenacetin with a net weight of 548.7 grams (package 2) and cocaine hydrochloride and phenacetin with a net weight of 4392 grams (package 3). The basis of the opinion is a gas chromatography/mass spectrometry and Fourier Transform Infrared Spectrophotometry test conducted by the witness, according to generally accepted practices and procedures. A copy of the lab reports was previously provided as part of the government's response to the standing discovery order.

The government also intends to call Special Agent Robert Shinn, DEA. He will testify that, based upon the his training and experience, the quantity of narcotics seized in this case is indicative of distribution quantities.

Having made this disclosure, the government hereby demands a written summary of expert testimony that the defense reasonably expects to offer at trial pursuant to Rules 702, 703 or 705 of the Federal Rules of Evidence, describing the witnesses' opinions, the bases and the reasons for those opinions, and the witnesses' qualifications.

Respectfully submitted,

GUY A. LEWIS
UNITED STATES ATTORNEY
BY: 
DANA O. WASHINGTON
ASSISTANT UNITED STATES ATTORNEY
Court No. A5500418
500 E. Broward Blvd.
Ft. Lauderdale, FL 33394
Phone: (954) 356-7255 ext. 3520
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent via facsimile and

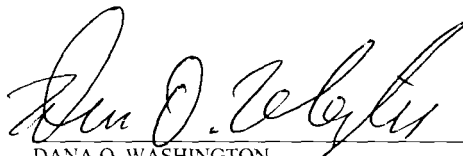
U.S. mail this day, March 8, 2001, to:

David Joffe, Esquire
2900 Bridgeport Avenue
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A handwritten signature in black ink, appearing to read 'Dana O. Washington', is written over a horizontal line.

DANA O. WASHINGTON
ASSISTANT UNITED STATES ATTORNEY

Maria E Hernandez***Curriculum Vitae***5205 NW 84th Avenue

Miami, FL 33166

(305)590-4830

Education

Master of Science in Chemistry 1998
Florida International University, Miami, FL

Bachelor of Science Degree
Florida International University, Miami, FL 1995

Associate in Arts Degree
Miami-Dade Community College, Miami, FL 1994

Work Experience

Forensic Chemist
Drug Enforcement Administration 1999-present

Chief Chemist
The Stephan Co. 1998-1999

Analytical Chemist
Florida International University 1995-1998

Teaching Assistant
Florida International University 1995-1998

Research Assistant
Florida International University 1994-1995

Training

University of Oklahoma, Norman, OK

A training program under the supervision of Dr. R. Phillips involving ^{13}C isotopic analysis and Pyrolysis GC

Honors

- Dean's List at both Florida International University and Miami-Dade Community College
- Member of the Golden Key Honor Society
- Certificate of Outstanding Academic Achievement extended at Miami-Dade Community College
- Award of Merit presented by the Mayor of the city of Hialeah
- 2nd place in the National Spanish Examinations conducted by the American Association of Teachers of Spanish and Portuguese
- Member of the National Association of Female Executives

Publications/Presentations

- M. Hernandez. "Molecular and Isotopic Characterization of Organic Matter from the Florida Everglades and the Florida Shelf: spatial and seasonal variability". Thesis
- M. Hernandez and R. Jaffe. "Molecular Characterization of Sedimentary Organic Matter from the Florida Everglades and the Florida shelf." Presented at the 18th International Meeting on Organic Geochemistry, Maastricht, The Netherlands, September 22-26, 1997
- M. Hernandez and R. Jaffe. "Molecular Composition of extractable lipids from the Florida Everglades: Assessment of organic matter sources." Presented at the First Annual Conference of the Walt Dineen Society, May 22-24, 1997
- M. Hernandez and R. Jaffe. "Molecular Characterization of Organic Matter from the Florida Everglades: Identification of Specific Biomarkers." Presented at the Florida ACS annual meeting, May 2-3, 1997
- M. Hernandez, Y. Deng, Gongora and Y. Zo. "Factors controlling the concentration of H_2O_2 in the Southeastern U.S." Extended Abstract accepted by the European Geophysical society, XXI General Assembly, Hague, The Netherlands, May 6-10, 1996